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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF HEARING ON REORGANIZED
DEBTORS' OBJECTION TO CLAIM
NO. 2441 FILED BY DON WORRELL**

Response Deadline:

January 11, 2023, 4:00 p.m. (Pacific Time)

Hearing Information If Timely Response Made:

Date: January 25, 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 **TO: (A) THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**
2 **JUDGE; (B) THE OFFICE OF THE UNITED STATES TRUSTEE; (C) THE AFFECTED**
3 **CLAIMANT; AND (D) OTHER PARTIES ENTITLED TO NOTICE:**

4 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E Corporation
5 and Pacific Gas and Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as
6 reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases
(the “**Chapter 11 Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

7 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on
8 **January 25, 2023, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable
Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Eighth*
Amended General Order No. 38 In re: COVID-19 Public Health Emergency, dated December 1, 2021,
9 and until otherwise ordered, **all hearings shall be conducted by video or teleconference. The**
10 **Courtroom will be closed.** All interested parties should consult the Bankruptcy Court’s website at
www.canb.uscourts.gov for information about Court operations during the COVID-19 pandemic. The
Bankruptcy Court’s website provides information regarding how to arrange a telephonic or video
11 appearance. If you have any questions regarding how to appear at a court hearing, you may contact the
Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy
12 Court’s website.

13 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at the
14 Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Reorganized Debtors’ Objection to*
Proof of Claim No. 2441 Filed By Don Worrell, filed by the Reorganized Debtors on December 2,
15 2022 [Dkt. No. 13308] (the “**Objection**”). By the Objection, the Reorganized Debtors seek to disallow
and expunge Proof of Claim Number 2441 (the “**Proof of Claim**”), filed by Don Worrell (the
16 “**Claimant**”), on the ground that it seeks amounts for which the Debtors are not liable. In deciding the
Objection, the Court may consider any other document filed in these Chapter 11 Cases and related
17 Adversary Proceedings.

18 **FILING AND SERVICE OF RESPONSE:** If the Claimant opposes the disallowance of the
19 Proof of Claim referenced above, then the Claimant **MUST** file a response (a “**Response**”), in writing,
with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at
20 PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on**
January 11, 2023 (the “Response Deadline”). The Response must be filed through the Court’s
21 electronic case filing (“ECF”) system if the Claimant has access to the ECF system; service on the
Reorganized Debtors’ Counsel will occur automatically upon ECF filing; and no separate service of
22 the Response is required. If the Claimant does NOT have access to the ECF system, service must be
made by electronic mail to the Reorganized Debtors’ counsel at PGEclaims@kbkllp.com, and the
23 Claimant must arrange for the Response to be filed with the Court within two business days thereafter.
If the Claimant does not have the ability to serve a Response electronically, the Response must be
24 served by mail, express or some other means so either (a) it is actually received by the Reorganized
Debtors’ Counsel by the Response Deadline, or (b) it is dispatched not later than the Response
25 Deadline through a postal or commercial express service that will make actual delivery not more than
two business days after the Response Deadline, and in that case the Claimant must inform the
26 Reorganized Debtors’ counsel by email, telephone or facsimile before the Response Deadline of the
fact that a paper Response is being delivered by express.
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1 **Any Response must be accompanied by any declarations or memoranda of law the**
2 **Claimant wishes to present in support of its position.**

3 **If there is no timely Response, the Bankruptcy Court may enter an order granting**
4 **the Objection and disallowing and expunging the Proof of Claim by default**
5 **without a hearing.**

6 **If a timely Response is filed, the Omnibus Hearing will be held at the date and time**
7 **shown above. If factual disputes are presented by the Objection and the Response,**
8 **the Omnibus Hearing will proceed as a status conference; factual disputes will not**
9 **be decided at the Omnibus Hearing, but at a future evidentiary hearing that may**
10 **be set at the Omnibus Hearing. Issues of a purely legal nature, where facts are not**
11 **in dispute, may be decided at the Omnibus Hearing. See Bankruptcy Local Rule**
12 **3007-1.**

13 **PLEASE TAKE FURTHER NOTICE** that copies of the Objection and its supporting papers
14 can be viewed and/or obtained: (i) by accessing the Court's website at <http://www.canb.uscourts.gov>,
15 (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA
16 94102, or (iii) from the Reorganized Debtors' notice and claims agent, Kroll Restructuring
17 Administration LLC (formerly known as Prime Clerk), at <https://restructuring.ra.kroll.com/pge> or by
18 calling (844) 339-4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties
19 or by e-mail at: pgeinfo@ra.kroll.com. Note that a PACER password is needed to access documents
20 on the Bankruptcy Court's website.

21 Dated: December 2, 2022

22 **KELLER BENVENUTTI KIM LLP**
23 **LITTLER MENDELSON, LLC**

24 By: /s/ Elisa Nadeau
25 Elisa Nadeau

26 *Attorneys for Debtors and Reorganized Debtors*